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6 *Attorneys for the United States*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 JONATHAN ROBERT RISSE-SANTOS,

13 Defendant.

Case No. 2:22-cr-00031-APG-BNW

**Stipulation to Continue Sentencing
(Fifth Request)**

14 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
15 United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel for the
16 United States of America, and Daniel Lippmann, Esq., counsel for Jonathan Risse-Santos, that
17 the Sentencing Hearing currently scheduled for November 8, 2022 at 9:00 a.m., be vacated and
18 continued to a date and time convenient to the Court, but no less than 30 days.

19 The Stipulation is entered into for the following reasons:

20 1. On November 5, 2022, defense counsel filed a sentencing memorandum, which
21 included an expert report.

22 2. Upon review of the sentencing memorandum, the government requested
23 discovery materials that forms the bases and reasons for the expert's opinions. These discovery
24 materials include reports, raw testing data, scoresheets, worksheets, notes, protocols, test

1 question materials, any result summaries and interpretative reports, recordings of
2 interviews/testing, and underlying facts and data supporting the expert's opinion, including
3 recordings and notes of Risse-Santos' interview.

4 3. The defense has agreed to provide this discovery material.

5 4. The government therefore needs additional time to receive the discovery material
6 from the defense, to prepare for sentencing, and, if necessary, acquire a rebuttal witness.

7 5. The defendant is incarcerated and does not object to the continuance.

8 6. The parties agree to the continuance.

9 This is the fifth stipulation to continue filed herein.

10 DATED this 7th day of November 2022.

11 JASON M. FRIERSON
12 United States Attorney

13 By /s/ Supriya Prasad
14 SUPRIYA PRASAD
Assistant United States Attorney

By /s/ Daniel Lippmann
DANIEL LIPPMANN
Counsel for Jonathan Risse-Santos

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JONATHAN ROBERT RISSE-SANTOS,
Defendant.

Case No. 2:22-cr-00031-APG-BNW

**Stipulation to Continue Sentencing
(Fifth Request)**

7 IT IS ORDERED that the requested discovery materials be produced to the government
8 no later than November 14, 2022.

9 IT IS ORDERED that the sentencing hearing currently scheduled for November 8, 2022
10 at 9:00 a.m. be vacated and continued to December 12, 2022 at the hour of 9:30 a.m.
11 in Courtroom 6C.

12 Dated this 7th day of November 2022.

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15 UNITED STATES DISTRICT JUDGE
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